

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>  <b>THIS DOCUMENT RELATES TO: ETHICON WAVE 4 CASES LISTED IN EXHIBIT A TO PLAINTIFFS MOTION</b>	<b>MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**REPLY IN SUPPORT OF PLAINTIFFS' MOTION TO  
EXCLUDE THE PROPOSED TESTIMONY OF JULIE DROLET, M.D.**

Plaintiffs submit this Reply in further support of their Motion to Exclude the Proposed Testimony of Julie Drolet, M.D. Defendants assert the Wave 4 Motion was not aimed at Dr. Drolet's opinions issued in her Wave 4 report. [Dkt. No. 3789]. This is simply not true. Dr. Drolet's opinions have not substantively changed between her Wave 1 and Wave 4 reports and it is those opinions that are being challenged in Plaintiffs' Motion, not merely the format of the reports.

Defendant proposes to offer into evidence Dr. Drolet's opinions regarding the safety and efficacy of the TVT-O and the Prolift+M. Dr. Drolet issued her Wave 4 reports (covering TVT-O and the Prolift/Prolift+M devices) on February 1, 2017. Plaintiffs adopted their arguments and Motion to exclude Dr. Drolet's general causation opinions that were issued in Wave 1. [Dkt. No. 3649 (adopting by reference the Motion [Dkt. No. 2093] and Memorandum [Dkt. No. 2094])]. While Dr. Drolet's Wave 1 report was issued in a specific Wave 1 case (the *Gomez v. Ethicon* matter), it contained largely the same general opinions she reissued in Wave 4 – albeit in a different format. It is the general opinions that persist through both Wave 1 and 4 reports that

Plaintiffs are moving to exclude. Simply because Dr. Drolet split her Wave 1 report into two separate reports does not change the methodology employed by, nor the general opinions held by, Dr. Drolet.

Accordingly, Plaintiffs adopt and incorporate their Reply in Support of Plaintiffs' Motion to Exclude the Proposed Testimony of Julie Drolet, M.D. [Dkt. No. 2254] and respectfully request the Court grant Plaintiffs' Motion.

Submitted this 4<sup>th</sup> day of May, 2017.

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing **REPLY IN SUPPORT OF PLAINTIFFS' MOTION TO EXCLUDE THE PROPOSED TESTIMONY OF JULIE DROLET, M.D.**, on May 4, 2017, using the Court's CM/ECF filing system, thereby sending notice of said filing to all counsel.

/s/ Joseph J. Zonies  
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